

# **EXHIBIT HH**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN JOSE DIVISION  
4  
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6 IN RE: HIGH-TECH EMPLOYEE )  
7 ANTITRUST LITIGATION )  
8 ) No. 11-CV-2509-LHK  
9 THIS DOCUMENT RELATES TO: )  
10 ALL ACTIONS. )  
11 \_\_\_\_\_ )  
12  
13  
14

15 VIDEO DEPOSITION OF CHUONG NGUYEN  
16 February 14, 2013  
17  
18

19 REPORTED BY: GINA V. CARBONE, CSR NO. 8249, RPR, CCRR  
20  
21  
22  
23  
24  
25

11:17:00 1 else?

11:17:01 2 A. I don't know.

11:17:03 3 Q. You said it was primarily -- [REDACTED]

11:17:08 4 [REDACTED]

11:17:10 5 [REDACTED] [REDACTED]

11:17:11 6 [REDACTED]

11:17:15 7 [REDACTED]

11:17:17 8 [REDACTED]

11:17:18 9 A. I don't recall.

11:17:27 10 Q. If you turn to the first page of that exhibit,

11:17:30 11 on May 5th you write to him --

11:17:33 12 MS. ZENG: Just slow down a little bit.

11:17:34 13 We're still on 738.

11:17:37 14 THE WITNESS: I'll put this one away.

11:17:38 15 MS. ZENG: Yeah.

11:17:39 16 MS. SHAVER: Q. Thank you.

11:17:43 17 A. First page you said?

11:17:44 18 Q. Yeah. On the first page, the second email from

11:17:45 19 the top, on Wednesday, May 5th you write, [REDACTED]

11:17:51 20 [REDACTED]

11:17:55 21 [REDACTED]

11:18:00 22 [REDACTED]

11:18:04 23 Do you see that?

11:18:05 24 A. Uh-huh.

11:18:07 25 Q. So the one -- [REDACTED]

11:18:12 1 [REDACTED]

11:18:18 2 [REDACTED]

11:18:19 3 A. Uh-huh.

11:18:23 4 Q. [REDACTED]

11:18:30 5 [REDACTED]

11:18:39 6 [REDACTED]

11:18:41 7 A. [REDACTED]

11:18:44 8 [REDACTED]

11:18:46 9 Q. [REDACTED] [REDACTED]

11:18:49 10 [REDACTED]

11:18:53 11 A. [REDACTED]

11:18:56 12 [REDACTED] [REDACTED]

11:18:58 13 [REDACTED] [REDACTED]

11:19:02 14 [REDACTED]

11:19:04 15 [REDACTED]

11:19:06 16 [REDACTED]

11:19:11 17 Q. [REDACTED]

11:19:13 18 [REDACTED]

11:19:16 19 [REDACTED]

11:19:17 20 A. [REDACTED]

11:19:18 21 Q. [REDACTED]

11:19:20 22 A. [REDACTED]

11:19:22 23 Q. [REDACTED] [REDACTED]

11:19:24 24 [REDACTED]

11:19:26 25 [REDACTED]

11:19:26 1 A. [REDACTED]

11:19:27 2 Q. [REDACTED]

11:19:29 3 A. [REDACTED]

11:19:38 4 Q. [REDACTED] [REDACTED]

11:19:50 5 You can put that aside. Thanks.

11:19:53 6 A. Okay.

11:19:54 7 Q. You, yourself, were cold called by Google,

11:19:58 8 right?

11:20:00 9 A. Yes.

11:20:03 10 Q. How many times?

11:20:06 11 A. I recall once.

11:20:08 12 Q. And when was that?

11:20:12 13 A. A year or two ago, approximately.

11:20:16 14 Q. So 2011 or 2012?

11:20:18 15 A. Maybe. Probably.

11:20:21 16 Q. And what was your response?

11:20:24 17 A. [REDACTED] [REDACTED]

11:20:30 18 [REDACTED]

11:20:36 19 [REDACTED]

11:20:37 20 Q. [REDACTED]

11:20:39 21 A. [REDACTED]

11:20:42 22 Q. [REDACTED]

11:20:47 23 A. [REDACTED]

11:20:49 24 Q. [REDACTED]

11:20:51 25 A. [REDACTED]

11:21:08 1 MS. SHAVER: Please mark this Plaintiffs'

11:21:10 2 Exhibit 739. This is INTUIT\_009519.

11:21:31 3 (Whereupon, Exhibit 739 was marked for

11:21:31 4 identification.)

11:21:37 5 MS. SHAVER: Q. Is this the cold call you

11:21:39 6 remember receiving from Google?

11:21:41 7 A. Yes.

11:21:42 8 Q. Does this refresh your recollection that it

11:21:44 9 happened in January 2010?

11:21:47 10 A. Yes.

11:22:05 11 Q. [REDACTED]

11:22:07 12 A. [REDACTED]

11:22:11 13 Q. [REDACTED]

11:22:15 14 [REDACTED]

11:22:17 15 A. [REDACTED]

11:22:21 16 Q. [REDACTED]

11:22:23 17 [REDACTED]

11:22:26 18 [REDACTED]

11:22:28 19 A. [REDACTED]

11:22:30 20 Q. [REDACTED]

11:22:51 21 Will you please mark this Plaintiffs' Exhibit

11:22:54 22 740. This is INTUIT\_009540.

11:23:21 23 (Whereupon, Exhibit 740 was marked for

11:23:21 24 identification.)

11:23:22 25 MS. SHAVER: Q. Do you recognize this

11:45:48 1 environments.

11:45:49 2 Q. Any other criteria?

11:45:51 3 A. Yes.

11:45:56 4 MS. SHAVER: This would be a good time to take  
11:45:58 5 a break.

11:46:00 6 THE VIDEOGRAPHER: This is the end of video  
11:46:01 7 No. 2. The time is 11:46 a.m. We're going off the  
11:46:05 8 record.

11:46:10 9 (Recess taken.)

11:58:26 10 THE VIDEOGRAPHER: This is the beginning of  
12:02:28 11 video No. 3 in the deposition of Chuong Nguyen. The  
12:02:33 12 time is 12:02 p.m. We're back on the record.

12:02:38 13 MS. ZENG: Before we get started, I just wanted  
12:02:41 14 to say the witness would like to read and sign the  
12:02:43 15 deposition.

12:02:48 16 MS. SHAVER: Q. [REDACTED]

12:02:51 17 [REDACTED]

12:02:55 18 [REDACTED]

12:02:56 19 MS. ZENG: Objection. Lacks foundation. Calls  
12:02:57 20 for speculation.

12:02:59 21 MR. KIERNAN: Can we -- real quick, can we just  
12:03:01 22 do maybe time and then either executive recruiting and  
12:03:05 23 technical? Just so we have -- I just want the  
12:03:09 24 record....

12:03:11 25 MS. SHAVER: Sure.

12:03:16 1 Q. [REDACTED]

12:03:23 2 [REDACTED]

12:03:25 3 [REDACTED]

12:03:31 4 MS. ZENG: Objection. Lacks foundation.

12:03:32 5 THE WITNESS: [REDACTED]

12:03:33 6 MS. SHAVER: Q. [REDACTED]

12:03:37 7 [REDACTED]

12:03:38 8 [REDACTED]

12:03:41 9 [REDACTED]

12:03:42 10 A. [REDACTED]

12:03:45 11 Q. [REDACTED]

12:03:48 12 [REDACTED]

12:03:51 13 [REDACTED]

12:03:52 14 A. [REDACTED]

12:03:54 15 Q. Does Intuit have an employee compensation

12:03:57 16 department?

12:03:59 17 A. We do, yes.

12:04:00 18 Q. What's it called?

12:04:03 19 A. Right now, I think it's called Total Rewards or

12:04:06 20 something like that.

12:04:07 21 Q. Do you know what it was called when you were

12:04:09 22 technical recruiter?

12:04:11 23 A. I don't recall.

12:04:12 24 Q. Was it called something besides Total Rewards?

12:04:16 25 A. Maybe comp and benefits. I don't know.



12:04:19 1 Q. When you were technical recruiter, did you work  
12:04:23 2 with the compensation and benefits staff?

12:04:29 3 A. I don't recall. I don't think so.

12:04:34 4 Q. Did you ever have conversations with the  
12:04:38 5 compensation and benefits staff?

12:04:45 6 A. Yes. But I think it was part of, like, a  
12:04:47 7 broader kind of talking to our entire team.

12:04:54 8 Q. Entire HR team?

12:04:55 9 A. The recruiting team.

12:04:57 10 Q. Recruiting team.

12:05:03 11

12:05:06 12

12:05:09 13

12:05:18 14

A.

12:05:20 15

12:05:22 16

Q.

12:05:24 17

MS. ZENG: Objection. Vague. Lacks

12:05:25 18

foundation.

12:05:26 19

THE WITNESS:

12:05:29 20

12:05:33 21

MS. SHAVER: Q.

12:05:35 22

12:05:38 23

12:05:41 24

A.

12:05:44 25

Q.

12:05:47 1 [REDACTED]

12:05:49 2 [REDACTED]

12:05:50 3 A. [REDACTED]

12:05:52 4 Q. Do you know if that was the practice of other

12:05:54 5 technical recruiters?

12:05:55 6 A. I don't know.

12:06:02 7 Q. [REDACTED]

12:06:05 8 [REDACTED]

12:06:10 9 [REDACTED]

12:06:15 10 MS. ZENG: Objection. Calls for speculation.

12:06:18 11 THE WITNESS: [REDACTED]r

12:06:20 12 [REDACTED]

12:06:25 13 MS. SHAVER: Q. [REDACTED]

12:06:26 14 [REDACTED]

12:06:29 15 A. [REDACTED]

12:06:32 16 [REDACTED]

12:06:37 17 Q. [REDACTED]

12:07:16 18 As an executive recruiter, do you work with the

12:07:20 19 Total Rewards team?

12:07:21 20 A. Yes.

12:07:23 21 Q. And how do you work with the Total Rewards

12:07:25 22 team?

12:07:29 23 A. [REDACTED]

12:07:34 24 Q. And what's their job or their role in the offer

12:07:38 25 negotiation phase?

12:07:39 1 A. [REDACTED]

12:07:42 2 [REDACTED]

12:07:44 3 Q. [REDACTED]

12:07:47 4 [REDACTED] [REDACTED]

12:07:50 5 A. [REDACTED]

12:08:01 6 Q. [REDACTED]

12:08:04 7 [REDACTED]

12:08:06 8 A. [REDACTED] [REDACTED]

12:08:20 9 [REDACTED]

12:08:21 10 Q. Yes.

12:08:21 11 A. Yes.

12:08:26 12 Q. [REDACTED]

12:08:29 13 [REDACTED]

12:08:37 14 A. [REDACTED] [REDACTED]

12:08:52 15 MS. CISNEROS: What do you mean by that?

12:08:55 16 THE WITNESS: [REDACTED]

12:08:56 17 [REDACTED]

12:08:59 18 [REDACTED]

12:09:07 19 MS. SHAVER: Q. [REDACTED]

12:09:09 20 [REDACTED]

12:09:12 21 [REDACTED]

12:09:18 22 [REDACTED]

12:09:21 23 MS. ZENG: Objection. Calls for speculation.

12:09:24 24 THE WITNESS: [REDACTED]

12:09:26 25 [REDACTED]

1 I, Gina V. Carbone, Certified Shorthand  
2 Reporter licensed in the State of California, License  
3 No. 8249, hereby certify that the deponent was by me  
4 first duly sworn and the foregoing testimony was  
5 reported by me and was thereafter transcribed with  
6 computer-aided transcription; that the foregoing is a  
7 full, complete, and true record of said proceedings.

8 I further certify that I am not of counsel or  
9 attorney for either of any of the parties in the  
10 foregoing proceeding and caption named or in any way  
11 interested in the outcome of the cause in said caption.

12 The dismantling, unsealing, or unbinding of  
13 the original transcript will render the reporter's  
14 certificates null and void.

15 In witness whereof, I have hereunto set my  
16 hand this day: February 21, 2013.

17 \_\_\_X\_\_\_ Reading and Signing was requested.

18 \_\_\_\_\_ Reading and Signing was waived.

19 \_\_\_\_\_ Reading and signing was not requested.

20

21

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23

\_\_\_\_\_  
GINA V. CARBONE

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CSR 8249, RPR, CCRR

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